

KASOWITZ BENSON TORRES LLP

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April 13, 2020

Honorable Alison J. Nathan
United States Courthouse
40 Foley Square Courtroom 906
New York, NY 10007

Re: United States v. John Geraci 18-CR-00715

Dear: Judge Nathan

We file this letter to respectfully request an extension of the May 1, 2020 surrender date for Mr. John Geraci to July 1, 2020 due to Mr. Geraci's current medical condition and the COVID-19 pandemic. This Court previously granted a continuance of Mr. Geraci's surrender date from March 23, 2020 to May 1, 2020. see Exhibit A, attached.

In March, prior to his previous surrender date, Mr. Geraci was hospitalized at Baptist Health South Florida Hospital. At that time, he was being treated for heart issues as well as symptoms consistent with COVID-19. Mr. Geraci was released from the hospital to isolation at home. Mr. Geraci is currently suffering from pneumonia. He is being treated remotely, via virtual medical appointments, by physicians from South Miami Hospital. Mr. Geraci is currently taking antibiotics and will be returning to the hospital this Thursday, April 16, 2020, for further COVID-19 testing.

Counsel for Mr. Geraci spoke with Officer Navarro, Mr. Geraci's Probation Officer on April 13, 2020. Officer Navarro informed counsel he has been in weekly contact with Mr. Geraci and is aware of his current medical condition and consents to the requested sixty day extension of Mr. Geraci's surrender date. Counsel for Mr. Geraci has also received consent of Mr. Lenow, AUSA, for this additional sixty day delay of Mr. Geraci's surrender date to July 1, 2020.

For the above-stated reasons, Counsel for Mr. Geraci, with the consent of the Government and the United State Probation Department, respectfully requests a continuation of Mr. Geraci's surrender date from **May 1, 2020 to July 1, 2020.**

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Sincerely,
Marissa E. Miller

/s/ Marissa E. Miller
Lyn R. Agre

/s/ Lyn R. Agre
Counsel for John Geraci